

0356

478A.TXD980508808 0001
ZOECON INDUSTRIES
FARMERS BRANCH, TX 75234

10508808
VOL 01



000000031973 HZ/RC/NT

478A.TXD980508808 0001

8 0 8

0357

**ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY**

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

TXD-98-050-8808

ZOECON INDUSTRIES
P.O. BOX 340231
DALLAS, TX 75234

INSTALLATION ADDRESS

12847 VALLEY BRANCH
FARMERS BRANCH, TX 75234

0358

BXF
1XD980508808

RECORD OF COMMUNICATION		<input checked="" type="checkbox"/> PHONE CALL <input type="checkbox"/> DISCUSSION <input type="checkbox"/> FIELD TRIP <input type="checkbox"/> CONFERENCE <input type="checkbox"/> OTHER (SPECIFY) _____	
		(Record of item checked above)	
TO: Dr. Horwood Hill		FROM: Samuel Coleman Christina Yall	DATE 24 May 89 TIME 1630
SUBJECT Zeecon Site located at Farmers Branch, Texas			
SUMMARY OF COMMUNICATION <p>Ms. Yall and I contacted Dr. Hill at approximately 1630 on May 24, 1989. I asked Dr. Hill if he had a specific question about Zeecon that we could help him with. He said he had lived in the area and was wondering if there was any problem with the drinking water. He was sure that he had water service from Dallas, but was curious anyway. Ms. Yall advised him that Zeecon was under a corrective action order issued by the Texas Water Commission (TWC), and that Zeecon was employing a pump and treat system in wells approximately 25 to 50 feet deep. We went on to explain that the contamination involved pesticides that tended not to migrate through soils. Dr. Hill was familiar with this. We pointed out that any drinking water well would be at a substantially greater depth.</p> <p>Dr. Hill asked if anything was being done to treat the soil in conjunction with the water treatment. We advised him that nothing was being done. However, Zeecon had removed some contaminated soil in 1988 at the same time they removed some underground storage tanks.</p> <p>Dr. Hill thanked us and stated that he appreciated someone getting back with him. He asked if he had any other questions and advised him that TWC had the lead and was monitoring the situation. He said he had all the information he needed.</p>			
CONCLUSIONS, ACTION TAKEN OR REQUIRED No further action			
INFORMATION COPIES TO: Davis (6R), Brown (6R-C)			

0359

Zoecon
Dallas, Texas

Zoecon is a pesticide manufacturing plant located on the boarder between the city of Dallas and the city of Farmers Branch. The Farmers Branch Historical Park is located adjacent to the facility.

Zoecon is under a Corrective Action Order issued by TWC. The Order included soil + tank removal as well as a pump and treatment program for the shallow aquifer located beneath the facility.

The City of Farmers Branch has instigated its own sampling program in the Park to investigate any off site contamination.

RCRA Enforcement Branch
 (6H-C) 5-6745
Texas Section Route Slip

ROUTE DATE SIGN

BROWN, Randall (Randy)
 Branch Chief (6H-C) X-6745

TREGONING, Harriet
 Chief ALONM (6H-CS) X-6754

TIDMORE, Guy
 Chief Technical (6H-CX) X-6665

THOMPSON, Linda
 Chief Oversight (6H-CO) X-6765

ANDERSON, Holly

BLACK, LaDonna

COOKS, Teresa

CROUTHER, Desi

MAIEFSKI, David

ROMO, Bonnie

TATES, Sam

TRUITT, Jerry

VAIL, Christina ✓

COMMENTS Bill Gallagher
used to be the POC
for this. Now you are
the POC. You and I
need to talk to Bill sometime soon

FROM: Samuel (Sam) Coleman, Chief
 Texas Section (6H-CT)
 RCRA Enforcement Branch 5/23
 X-6759

0361

RCRA ENFORCEMENT BRANCH

	ROUTING	INITIAL
SAMUEL COLEMAN	✓	
HARRIET TREGONING		
LINDA THOMPSON		
GUY TIDMORE		
BETSY METCALF		
DANNA SMITH		
GUANITA REITER		
BILL HONKER		

AL DAVIS/JACK DIVITA

COMMENTS *You need to find out who knows about this site. It probably gets hot when Shale Jackson stirs things up.*

Van G

FROM: RANDALL E. BROWN, CHIEF
RCRA ENFORCEMENT BRANCH

0362

5-19-89

4:45

Phil Charles

Zoecon - Test Well near Park

DMW call

2.8 ppb dieldrin

148 ppb ethyl benzene

Phil will tell reporter

- we can't draw any conclusions
- QA/data credibility issues
- TWC is assessing site

0363

HAZARDOUS WASTE RCRA PERMITS BRANCH

6H-P

ROUTING

BILL GALLAGHER

BILL LUTHANS

TONY ROBLEDO

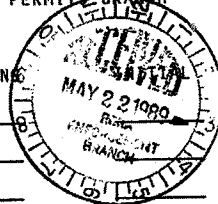
TOM CLARK

CAROL TEDFORD

GLORIA RONQUILLO

RANDALL BROWN

GUANITA REITER



COMMENTS FYI. Phil may follow

up w/ you Mon.

FROM: BILL HONKER, CHIEF
HAZARDOUS WASTE RCRA PERMITS BRANCH (6H-P)
5/19 PHONE: 655-6770

Farmers Branch Times

Wednesday, February 22, 1989

Zoecon site samples could

By JANE GORE WHITLEDGE
Staff Writer

The Farmers Branch city council learned Monday that recent soil samples taken from the Historical Park near the Zoecon boundary line were not analysed in compliance with the Environmental Protection Agency standards. New samples taken just inches from the sites of the first samples reveal high levels of toxaphene, a carcinogenic pesticide.

The original samples indicated only acceptable levels of any constituents.

Tom Scales, director of community services, told the council that Tom McDougald, the city's environmental officer, had studied the sample analysis in-

formation and determined that the specific EPA time limits imposed on labs for analysing soil samples had not been met.

"When we first got the results we thought proper procedure had been followed," Scales said.

New samples were taken and analysed. The new results have not been seen by the city's environmental toxicology consultant, Dr. William Lowery, but were scheduled to be delivered to him Tuesday.

The second samples indicate 54 parts per million of toxaphene at site 18, which is farthest from the Zoecon boundary and 31 parts per million at site 19, which is only 23 feet from Zoecon. The Texas Water Commission has said that 4 parts per million is the acceptable limit.

Continued

be worse: Tests were old

Scales told the council toxaphene has been found in the park in the past. It was found in extremely high levels in the park area where soil was removed in 1986 because of apparent contamination.

The city council a few weeks ago directed the city staff to have independent samples taken after Zoecon officials said the corporation would only agree to test further for two constituents, xylene and benzene. The city has long been concerned with the proximity to the Historical Park of a chemical pesticide-producing plant and about hazards to the public from possible soil or groundwater contamination.

The city and Zoecon, which is in Dallas city limits, have both conducted extensive testing over the years. The TWC recently said Zoecon had met all that agen-

cy's requirements and no further testing needed to be done. But the city chose to do its own testing for a wide variety of constituents, hoping to end the speculation about the park and move on, councilmembers said.

City Manager Richard Escalante said Monday that as much as the city might want to move on, not enough evaluation had been done on this recent information "to call it a closed case."

The city will now begin a grid system to determine if the spots with the high toxaphene levels are spots or indicators of larger problems. More soil tests will be done around the area of the samples, according to Scales.

Turn to ZOECON, page 8A

(more)

0365

Zoecon

From page 1A

According to McDougald the lab error became evident when he examined forms that are attached to the samples. McDougald said the second sampling had been analysed with great expediency, free of charge to the city.

McDougald noted that the city requested checks for as many as 55 constituents on the recent samples and only toxaphene and minute trace samples of DDD and DDE, products of DDT breaking down, were found.

Scales and Escalante also told the council Monday that a decision by the Dallas Planning Commission on Zoecon's request for rezoning had been delayed. Escalante explained that he and the city staff are concerned about storm water retention at Zoecon's facility and have requested that the new site plan contain allowances for storm water storage facilities. The Farmers Branch staff is concerned that if it isn't included in the site plan it will not be possible in the future.

Pine Bluff Commercial Grant County Quorum OKs Class 4 Landfill Near Sheridan

FEB 14 1989

SHERIDAN — The Grant County Quorum Court on Monday night approved a resolution seeking to open a Class 4 landfill west of Sheridan.

According to Judge Roy Baxley of Grant County, the resolution gives him permission to enter into an agreement with the state Pollution Control and Ecology Department, which has to rule on the request.

A Class 4 landfill allows for the dumping of trees, tires, appliances and other non-contaminating items, Baxley said. No household garbage may be dumped at the site.

The agreement with the PC&E states that, when the county is finished with the landfill, it will be properly covered or the county will pay a fine.

"Some of the residents in the

general area said that they do not have any problems with having the Class 4 out there," Baxley said this morning but added that residents did not favor a landfill that would allow household garbage or other possible contaminants to be dumped.

PC&E is in the process of reviewing the application, testing the soil, and giving public notice before it can grant final approval. Baxley said he did not anticipate any problems.

If approved, the landfill will be located about four miles west of Sheridan.

Wells contaminated

Next to former Beach Park

covered site, contain move off site

TWC not doing enough

TWC has wells + pump + treat
(as per state pt)

also soil removal.

Share Jackson used to work lost job
now fights

EPA look at TWC at this point adequate

TWC person assigned to cage.

Farmers Branch Times

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City Manager Richard Escalante said Monday that as much as the city might want to move on, not enough evaluation had been done on this recent information "to call it a closed case."

The city will now begin a grid system to determine if the spots with the high toxaphene levels are hot spots or indicators of larger problems. More soil tests will be done around the area of the samples, according to Scales.

Turn to ZOECON, page B1

(more)

Zoecon

From page 1A

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0369

RECORD OF COMMUNICATION

January 15, 1986

SUBJECT: Zoecon, Dallas, Texas

FROM: Shane Jackson (Citizens Against The Silence, CATS)

TO: Will Focht (6H-CE)

Earlier this week, Shane called me to inform me that he had recently obtained information regarding contamination at the Zoecon site and he wanted to submit this to EPA for its consideration. At that time I asked that Shane submit this information in writing.

At 1:40 p.m. on Thursday, January 15, 1987, Shane called me again to inform me that he had elected not to submit this information in writing, upon advice of his counsel. Shane intimated that his group was considering some form of legal action against TWC and/or some members of its staff to require additional investigation of the Zoecon site and environs, and possibly against certain staff members for apparent improprieties in dealings with Zoecon and the city of Dallas. He basically wanted EPA to know of his concerns so that we could take appropriate action.

Shane read to me over the phone certain excerpts from a TWC conference record regarding the recent discovery of 38 percent toxaphene in groundwater under Zoecon's facility and that TWC had advised Zoecon to plug and abandon monitoring well PW-5 because it was providing a pathway of contamination to groundwater from a truck loading area. Shane also read a sentence from the conference record which read "TWC agreed to inform Zoecon of any response to the city of Dallas before sending a letter of reply." I stated that it would be useful to see this conference record.

At 2:15 p.m., I was called down to the library on 27 (floor) to meet with Shane. He brought a copy of the conference record and a copy of a January 14, 1987, article by Bill Moore in the Farmers Branch Times. Shane informed me that, as a result of his testimony before the Dallas Environmental Health Commission, the Commission had requested that TWC require additional wells to further investigate groundwater contamination. Apparently the TWC denied the Commission's request. Then on November 6, 1986, the Commission again requested that TWC undertake additional investigation. On November 18, 1986, TWC met with Zoecon in Austin to discuss groundwater contamination. Shane pointed out that the second to last paragraph of this conference record indicated that TWC intended to let Zoecon review any response that TWC would be sending to the Dallas Environmental Health Commission, before sending it. (Copy of conference record is attached.)

Shane also raised concerns about dioxin. There is an allegation that Ronnel, a pesticide manufactured by Dow and used by Zoecon in formulation of some of their products until 1981, contains dioxin. Shane said that Dow had tested their Ronnel and found no dioxin. However, Dow used a relatively high detection limit (in the ppm range). Zoecon's position is that there is no dioxin in its products. However, Zoecon had tested for dioxin in 1981 for its NPDES permit application, indicating a suspicion of dioxin. Shane wants an investigation for dioxin (A copy of the Farmers Branch Times article discussing this issue is attached.)

Attachments

cc: Taylor (6H-CE); Becker (6H-C); Davis (6H); Meacham (6X); Dyer (6T-P); Huffman (6W-P1); Thomas (6H-EC); Zoecon file

ISY
NW

C O N F E R E N C E R E C O R D

Project: Zoecon Corporation SWR No. 30702
Conference date: November 18, 1986 Place: SFA Bldg. #215
Type of conference: Technical
(telephone, staff, formal or informal hearing,
other)

Attendance:

Name	Agency
See attached signature sheet	WV CIV - 37 101

Summary:

Zoecon called the meeting to discuss the ground water remediation plan.

Rick Bost gave a brief summary of Zoecon's proposal. They plan to build a slurry wall around the LMR area, and do pumping in the Roach Trap area. They then plan reinjection of treated waste. They are currently performing column tests on activated carbon, and tests of biological treatment. They have installed one test well in the Roach Trap area and one in the LMR area.

Jim Haley stated that Zoecon won't need a permit for treatment processes because they are doing a cleanup. Diana Dutton said she'd write a letter to document that opinion.

Paul Lewis questioned the company's conclusion that the groundwater is flowing towards the creek, since the top of the

Prepared by: Alan Rojas

137.1

Zoecon Corporation

Page 2

shale slants away from the creek. Rick Bost stated that there is a hydraulic connection between the groundwater and the creek and that the groundwater modelling shows the same.

Paul Lewis asked if the recovery process will be sufficient to catch the brown fluid that is flowing away from the creek. Rick Bost said yes, studies show that pumping will create a depression, and they use pneumatic eductor pumps set approximately 2' above the Eagle Ford Shale. Rick Bost also stated that the fluid is 38% Toxaphene, heavier than water, and that the model doesn't really address the fluid other than as a source for leaching. The fluid was only found in MW-1, close to an underground tank location.

Table 4-2 gives the proposed schedule.

Paul Lewis inquired if the yield was sufficient for draw down. Rick Bost said yes.

Will Zoecon have enough recharge water if all they use is treated ground water? Company wants to have natural groundwater flushing inside slurry well. Zoecon does not plan to inject water inside the slurry wall.

Zoecon said they would provide the scale and relative location of the computer model's drawings as well as the location of the slurry walls.

The company wanted to know if they should continue filing monthly reports.

Zoecon will continue sampling of TOC and Toxaphene until recovery project is approved. The TWC reserves the right to change sampling plans later, if necessary.

TWC advised Zoecon to plug and abandon FW-5 since they feel it is a pathway to ground water from the truck unloading area.

TWC agreed to inform Zoecon of any response to the City of Dallas before sending letter of reply.

TWC agreed to an extension for deed recordation at facility No. 1 until Zoecon has had a chance to petition the registration unit for a waste classification change.

Alice Rogers
Alice Rogers

AHR/da

cc: Russell Kimble
Richard Clarke - TWC District 4 Office

January 14, 1987

Zoecon tested for dioxin in runoff during 1981

By BILL MOORE
Staff Writer

Despite Zoecon Industries' past statements that it never tested for dioxin on its property or in the adjacent Farmers Branch Historical Park, a document given to the Dallas Environmental Health Commission Monday shows it tested for the deadly chemical in 1981.

The document, originally submitted by Zoecon to the Environmental Protection Agency in 1981 as part of an application for a storm water runoff permit,

showed that dioxin was one of many chemicals tested for.

Jim Thomas, Zoecon's manager of health, safety and environment, said Tuesday that he did not know about the testing but said it only proves that dioxin was not on the site.

"Our position is the same, that there is no reason to test for TCDD, or dioxin," he said. "It is appropriate to test for Ronnell, but not TCDD."

While dioxin was not found, local activist Shane Jackson told the commission that testing for

Turn to ZOECON, page 2A

Zoecon

From page 1A

the deadly toxin proved that Zoecon suspected it was in the water.

Further, because the document said that several other chemicals were not found in the water — although all but one were later discovered in monitoring wells ordered by the Texas Water Commission — Jackson said it reinforces his belief that dioxin is in the park soil.

"Every time we have said that a chemical was used on the property, they (Zoecon) have said it wasn't. Then when we came back and proved it, the response was, 'Yeah, but so what?' And this is the company we are building the Historical Park next to," he said.

Several analyses of park soil have been done over the last two years. Approximately 350 cubic yards of park soil contaminated with the solvent toxaphene and several other chemicals found at the Zoecon site were removed

last summer. Subsequent tests by the Texas Water Commission confirmed that the contaminated soil had been removed and that the area posed no health risk.

Thomas found the document mentioning dioxin in a large stack of documents recently released to him by the EPA's Region VI office in response to his use of the Freedom of Information Act.

Zoecon used at least 32,000 pounds of Ronnell in its formulation of products such as fly baits from 1973-1981, records show. Thomas said all of the Ronnell came from Dow Chemical until the firm quit making it in 1977. Another chemical, methomyl, was then substituted by Zoecon.

Dioxin, according to an EPA "fact sheet", is an "unwanted but almost unavoidable by-product that comes from manufacturing of several commercial substances, chiefly the pesticide 2,4,5-trichlorophenol (2,4,5-TCP)," which is used in

Ronnell.

The Center for Disease Control considers one part per billion of dioxin in soil to be a level of concern in residential areas.

Terry Witt, public relations manager with Dow Chemical in Michigan, said that finding trace amounts of dioxin in an area did not mean that Ronnell had been manufactured there. Trace amounts of dioxin recently have been found at city incineration sites, such as the one in Nashville, and trace amounts could even be present in a home's fireplace, he said.

The Dallas health commission, an advisory body that reports to the Dallas City Council, took Jackson's comments under advisement.

TWC last month denied the commission's request that more test wells be dug in the Historical Park and west of the Zoecon plant on Denton Road.

Farmers Branch Times

A Harte-Hanks Community Newspaper

409-730-3600

Serving Farmers Branch Since 1958

Times-Chronicle-Today Publishing Company, A Division of Harte-Hanks Communications, Inc., 1712 S. Loop West, Carrollton, Texas 75006. Mailing Address: P.O. Box 110938, Carrollton, Texas 75011-0938.

373

UNIT. STATES ENVIRONMENTAL PROTECTION AGENCY

OCT 10 1986

Mr. Bryan W. Dixon, Director
Hazardous and Solid Waste Division
Texas Water Commission
P.O. Box 13087, Capitol Station
Austin, Texas 78711

Dear Mr. Dixon:

Enclosed is a copy of the draft CDC report regarding Zoecon for your use.

If you have any comments on the content of this report or subsequent CDC
involvement, please contact Carl Hickman at (214) 767-9872.

Sincerely yours,

Sam Becker, Chief
Hazardous Waste Compliance Branch

Enclosure

6H-CE:TAYLOR:trb:x2850:10/07/86

File Code: TXD980508808

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

EPA Form 1320-1 (12-79)

OFFICIAL FILE COPY

H.U.S. 220 1985-467-853

0374

Zoecon
TYD 98050
8808

DATE: September 1, 1985

SUBJECT: Soil Samples Results From Area Near Zoecon - Dallas

TO: Larry Thomas, 6AW-SE

FROM: Will Focht, 6AW-HE *Will*

While I am not particularly qualified to comment on health risks posed by the levels of pesticides found in these samples, I can nevertheless offer some information which may be helpful.

1. These samples were taken under the directive and direction of the TDWR. Specifically, Ann McGinley and Paul Lewis (117-9-463-7727) are the staff directly involved in approval of the sampling plan and review of the sample results. Whatever corrective action is required (e.g., excavation) will be determined by them following completion of their review.
2. The City of Farmers Branch has been fully involved in every step of this matter.
3. Zoecon has indicated to the TDWR their intention to fully cooperate and to remediate the area as necessary.
4. RCRA is not involved in this matter. TDWR is pursuing this under ancillary provisions of the Texas Water Code and not under their RCRA authorization. There is no information which would indicate that these soil residues constitute hazardous waste subject to RCRA Subtitle C regulation. (For your information, toxaphene in excess of 0.5 ppm (mg/l) which would leach from the soil when subjected to the Extraction Procedure Toxicity Test (EP toxicity) would qualify as a hazardous waste (EPA hazardous waste code, D015). However, to the best of my knowledge, no EP Toxicity tests have been run.)
5. RCRA is currently involved in the on-site closure of four underground tanks. Closure certification should be imminent. This closure is unrelated to the matter at hand.
6. Don Paschal and Bob Murphy in 6AW-P are also reviewing these results. Please contact them. Bob Murphy has indicated to me that the Texas Dept. of Agriculture believes that river backwashing in the vicinity of the storm water discharge pipes may be a factor in higher concentrations of toxaphene upstream.
7. You may wish to get CDC to look at these results.

If you need more information, please call me at 7-9884.

cc: B.Taylor, 6AW-HE; W.Rhea, 6AW-H; M.Satterwhite, 6AW

0375

Michelle -

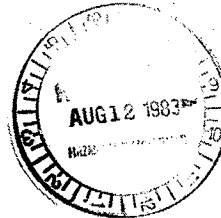
Please place this in Zolman's
enforcement file, thank.

-Will

0376

Zoecon Industries

August 8, 1983



U. S. Environmental Protection Agency
Region VI, Enforcement Division (6E)
1201 Elm Street
Dallas, TX 75270

To Whom It May Concern:

Reference RCRA EPA I.D. number TXD-98-050-8808
assigned to Zoecon Industries, installation
address 12847 Valley Branch, Farmers Branch, TX
75234, please cancel this registration.

Zoecon discontinued leasing a warehouse at the
installation address on September 2, 1982.

If more information is needed, please call Jim
Eklund (214) 243-2321.

Sincerely,

ZOECON INDUSTRIES

James F. Byrne
Safety, Health & Environment Manager

JFB/dp
Attachment

cc: Les Meier
Jim Eklund

70
1

8-16-83

MAILING ADDRESS: 12200 Denton Drive • Dallas, Texas 75234 • (214) 243-2321
CORPORATE ADDRESS: 12000 Ford Road • Dallas, Texas 75234
Telex #730775

0377

Use pre-printed or type with ELITE type (12 character) in the unshaded areas only.

Form Approved OMB No. 150-575016
No. 0245-EPA-OT

EPA U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO. _____

I. NAME OF INSTALLATION _____

II. INSTALLATION MAILING ADDRESS _____

III. LOCATION OF INSTALLATION _____

PLEASE PLACE LABEL IN THIS SPACE

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

FOR OFFICIAL USE ONLY

COMMENTS _____

INSTALLATION'S EPA I.D. NUMBER APPROVED DATE RECEIVED
(72, MO., & DAY)

FTXID98050880821

I. NAME OF INSTALLATION
ZOECON INDUSTRIES

II. INSTALLATION MAILING ADDRESS
STREET OR P.O. BOX
310 BOX 3140231
CITY OR TOWN ST. ZIP CODE
40 ALLAS TX 75234

III. LOCATION OF INSTALLATION
STREET OR ROUTE NUMBER
512847 VALLEY BRANCH
CITY OR TOWN ST. ZIP CODE
6 FARMERS BRANCH TX 76234 8101818

IV. INSTALLATION CONTACT
NAME AND TITLE (last, first, & job title) PHONE NO. (area code & no.)
2 BYRNE JAMES MGR SAFETY 214-243-2321

V. OWNERSHIP
A. NAME OF INSTALLATION'S LEGAL OWNER
ZOECON CORPORATION 71

B. TYPE OF OWNERSHIP (enter the appropriate letter in this box)
F = FEDERAL
M = NON-FEDERAL M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))
A. GENERATION
B. TRANSPORTATION (complete item VII)
C. TREAT/STORE/DISPOSE
D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))
A. AIR
B. RAIL
C. HIGHWAY
D. WATER
E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION
Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA I.D. Number in the space provided below.
A. FIRST NOTIFICATION
B. SUBSEQUENT NOTIFICATION (complete item C)
AUG 18 1990
C. INSTALLATION'S EPA I.D. NO.

IX. DESCRIPTION OF HAZARDOUS WASTES
Please go to the reverse of this form and provide the requested information.

EPA Form 8700-12 (6-80) CONTINUE ON REVERSE

0378

I.D. - FOR OFFICIAL USE ONLY											
W	T	X	D	9	8	6	5	0	8	8	2
1	2	3	4	5	6	7	8	9	10	11	12

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
23 - 24	25 - 26	27 - 28	29 - 30	31 - 32	33 - 34
7	8	9	10	11	12
35 - 36	37 - 38	39 - 40	41 - 42	43 - 44	45 - 46

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
23 - 24	25 - 26	27 - 28	29 - 30	31 - 32	33 - 34
19	20	21	22	23	24
35 - 36	37 - 38	39 - 40	41 - 42	43 - 44	45 - 46
25	26	27	28	29	30
47 - 48	49 - 50	51 - 52	53 - 54	55 - 56	57 - 58

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
23 - 24	25 - 26	27 - 28	29 - 30	31 - 32	33 - 34
37	38	39	40	41	42
43 - 44	45 - 46	47 - 48	49 - 50	51 - 52	53 - 54
43	44	45	46	47	48
55 - 56	57 - 58	59 - 60	61 - 62	63 - 64	65 - 66

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
23 - 24	25 - 26	27 - 28	29 - 30	31 - 32	33 - 34
55	56	57	58	59	60
61 - 62	63 - 64	65 - 66	67 - 68	69 - 70	71 - 72

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☐ 1. IGNITABLE
(D001)

☐ 2. CORROSIVE
(D002)

☐ 3. REACTIVE
(D003)

☒ 4. TOXIC
(D006) See below

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

Larry Grubb

NAME & OFFICIAL TITLE (Type or print)

Larry Grubb

DATE SIGNED

8-12-80

EPA Form 8700-12 (6-80) REVERSE

E. 4 Small quantity generator per 261.5

RECEIVED

AUG 18 1980

6AEP

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

ZOECON FILE

TXD/80509808

APR 18 1986

Mr. Paul West
City Manager
City of Farmers Branch
13000 Wm. Dodson Parkway
Farmers Branch, Texas 75231

Dear Mr. West:

Thank you for the letter on your behalf from Mr. John Boyle, of Jenkins, Hutchison & Gilchrist, dated March 21, 1986, regarding Zoecon Industries' compliance with the Resource Conservation and Recovery Act requirements for third party liability coverage in the event of non-sudden accidental occurrences.

Enclosed is a letter to Mr. Shane Jackson, dated March 29, 1986, prepared in response to his inquiries about Zoecon's insurance coverage. I hope that response will satisfactorily address your concerns. Should you have any questions or need further information, please do not hesitate to contact me.

Sincerely yours,

/s/ Frances E. Phillips for

Dick Whittington, P.E.
Regional Administrator

Enclosure

cc: Bryan Dixon
Texas Water Commission

bcc: M. Knudson (6W)
R. Hartung (6W-E)
L. Thomas (6H-EC)
W. Hathaway (6T)
P. Seals (6C)
D. Whittington (6A)
F. Phillips (6A)
P. Charles (6X)
J. Floeter (6M)

0380

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Mr. Paul West
 City Manager
 City of Farmers Branch
 13000 Wm. Dodson Parkway
 Farmers Branch, Texas 75234

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Sincerely yours,

Dick Whittington, P.E.
 Regional Administrator

Enclosure

cc: Bryan Dixon
 Texas Water Commission

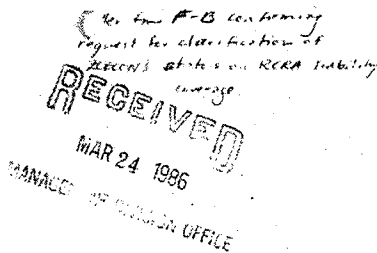
bcc: M. Knudson (6W)
 R. Hartung (6W-E)
 L. Thomas (6H-EC)
 K. Hathaway (vT)
 P. Seals (6C)
 D. Whittington (6A)
 F. Phillips (6A)
 P. Charles (6X)
 J. Floeter (6M)

CONCURRENCES	
SYMBOL	GH-CE-HTRBONING:hrt:X2850:4-6-86
SURNAME	GH-CE Taylor
DATE	GH-CE Recker
EPA Form 1320-1 (12-70)	

4-11
 4/11/86
 4/11/86

OFFICIAL FILE COPY
 U.S. GPO : 1985-461-853

0381



March 21, 1986

Ms. Kay Crouch
Texas Water Commission
P.O. Box 13087
Capitol Station
Austin, Texas 78711-3087

Mr. John Floeter
United States Environmental Protection Agency
Region VI
1201 Elm Street
Dallas, Texas 75234

Dear Ms. Crouch & Mr. Floeter:

RE: RCRA Liability Coverage, Zoecon Corporation

The undersigned represents the City of Farmers Branch in the capacity of City Attorney.

During the morning of March 21, I discussed with each of you the question of whether Zoecon Corporation was in compliance with 40 CFR 264. - 265.147 insurance requirements. This question arose as a result of receipt of a letter dated January 14, 1986 from Russell Kimble to Eugene L. Prukalski, copy attached. This letter was received by the City on the evening of March 20, 1986 from a local citizen.

According to Ms. Crouch the letter of January 14, 1986 does not reflect the correct status of the subject as Zoecon Corporation does have "sudden and accidental pollution" coverage which is all that is required. It is my understanding that the "non-sudden and accidental pollution" coverage is required only in plants that treat or dispose of certain products on site. The letter of January, 14, 1986 was apparently in error and a letter from each of you is to be sent to Mr. Paul West, City Manager for the City of Farmers Branch, confirming the matters set out in this letter.

0382

We appreciate your cooperation and prompt response.

Yours truly,

A handwritten signature in dark ink, appearing to read "JF Boyle Jr", written in a cursive style.

John F. Boyle, Jr.
Jenkins, Hutchison & Gilchrist

JFB/tlk

cc: Paul M. West

0383

TEXAS WATER COMMISSION

RECEIVED

Paul Hopkins, Chairman
 Ralph Roming, Commissioner
 John O. Houchins, Commissioner



January 14, 1986



MAR 20 1986

Larry R. Soward, Executive Manager
 Mary Ann Hefner, Chief Clerk
 James K. Rourke, Jr., General Counsel

Mr. Eugene L. Prukalski
 Sandoz Corporation
 608 Fifth Avenue
 New York, New York 10020

RE: RCRA Liability Coverage, Zoecon Industries
 Texas Water Commission Registration Number 30702

JAN 17 1986

Dear Mr. Prukalski:

Thank you for your letter of December 30, 1985 describing the efforts of Sandoz to obtain liability coverage for the above referenced facility. With regard to your request for a waiver of the January 1, 1986 deadline for obtaining new coverage, we presently have no mechanism by which we can grant such a waiver. However, as you may already know, there is a bill pending before the U.S. Congress (Bill H.R. 3917) which would allow EPA to extend interim permitting status for facilities that have shown a good faith effort to comply with both groundwater monitoring and financial assurance requirements. The bill would allow EPA to grant facilities an initial 45-day extension of interim status; a second extension until June 30, 1986 could be granted, with an additional extension to November 8, 1986 if it can be demonstrated that the insurance market continues to be constrained.

To my knowledge, this bill has yet to be passed by the Senate. Until such time as there is some amendment to the present regulations, facilities that do not have complete and adequate liability insurance coverage are in violation of 40 CFR 264.265.147 requirements. Please continue to keep this agency informed of your efforts and status. If you require assistance, please contact Ms. Kay Crouch of our Hazardous and Solid Waste Division at 512/463-7761.

Sincerely,

Russell Kimble, Head
 Program Support Unit
 Program Support Section
 Hazardous and Solid Waste Division

KC:kc

CC: Texas Water Commission District 4 Office

0384

**ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)**

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

TXD-98-050-8808

ZOECON INDUSTRIES
P.O. BOX 340231
DALLAS, TX 75234

INSTALLATION ADDRESS

12847 VALLEY BRANCH
FARMERS BRANCH, TX 75234

EPA Form 8700-128 (4-90)

0385

FJB



**FARMERS
BRANCH**

"BEST LIVING PLACE"

John D. Doss
Mayor
Bob C. Pheas
Mayor Pro Tem
Council Member-Place 4
Council Members
David D. Blair, Jr.
Place 1
John Dunagan
Place 2
Cora Davis
Place 3
Harb Wedinger
Place 5

Richard L. Escalante
City Manager

Mr. Allen Beinke
Executive Director
Texas Water Commission
P. O. Box 13087, Capitol Station
Austin, Texas 78711

Dear Mr. Beinke:

In a letter addressed to you dated January 28, 1988, the City of Farmers Branch requested that the Texas Water Commission require Zoecon to install additional piezometers in the City's Historical Park for groundwater monitoring. This request was made because of an EPA study which cast doubt on the ability of a soil/gas monitoring study used in the park to accurately map the groundwater contamination plume.

As of this date, the City has not received any response from you or from your staff. We appreciate a response to this request. We look forward to receiving your reply.

Thank you for considering this matter.

Sincerely,

[Signature]
Richard L. Escalante
City Manager

RLE/jp

cc: Joseph H. Lavin, Zoecon Corporation
Susan Ferguson, Texas Water Commission
Kenny Marchant, State Representative
John Bryant, U.S. House of Representatives
Steve Bartlett, U.S. House of Representatives
Dick Arney, U.S. House of Representatives
Annette Strauss, Mayor, City of Dallas
Robert E. Layton, Jr., U.S. EPA
Fred Barnes, City of Dallas Health & Human Services
John Dodd, Mayor, City of Farmers Branch
City Council, City of Farmers Branch

RECEIVED
REGION 1

APR 33 PM 4:1

HAZARDOUS WASTE MON

April 8, 1988

